

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN**

---

**Case No.:** 15-27622  
**Judge:** Beth E. Hanan  
**Chapter:** Chapter 13

**In Re: Adrian Buckley, Sr.  
Nicole Buckley**

---

**NOTICE AND REQUEST TO MODIFY CHAPTER 13 PLAN**

---

The Debtors, through Geraci Law, LLC, has filed papers with the court requesting modification of the Chapter 13 Plan in the above case.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.**

If you do not want the court to modify the plan as proposed, or if you want the court to consider your views on the request, then on or before 21 days after service of this notice, you or your attorney must:

File with the court a written request for hearing which shall contain a short and plain statement of factual and legal basis for the objection. File your written request at:

1. Clerk, U.S. Bankruptcy Court  
517 East Wisconsin Avenue, Room 126  
Milwaukee, WI 53202-4581

and provide copies to

United States Trustee  
Eastern District of Wisconsin  
517 East Wisconsin Avenue, Room 430  
Milwaukee, WI 53202

Scott Lieske  
Chapter 13 Trustee  
P.O. Box 510920  
Milwaukee, WI 53203

Geraci Law, LLC  
Alexander E. George  
2505 N. Mayfair Rd. #101  
Wauwatosa, WI 53226

Adrian Buckley  
Nicole Buckley  
4836 N. 66<sup>th</sup> St.  
Milwaukee, WI 53218

in time for its receipt by the above deadline. If you or your attorney do not take these steps, the Court may decide that you do not oppose the request and may enter an order modifying the Plan.

### **REQUEST TO MODIFY CHAPTER 13 PLAN**

1. The Proponents of this modification are the Debtors.
2. This is a request to modify a Chapter 13 Plan:
  - a.   x   post-confirmation
  - b.        pre-confirmation
    - i. Debtor(s)/Debtor(s) attorney certifies that the proposed modification does not materially adversely affect creditors (Local Bankruptcy Rule 3015(b)); or
    - ii. Debtor(s)/Debtor(s) attorney certifies that the proposed modification materially adversely affects only the following creditors and a copy of the proposed modification has been served on them (Local Bankruptcy Rule 3015(b)). The creditors affected are:  
See Attached

3. The Proponent wishes to modify the Chapter 13 Plan to do the following:

Account for the application for compensation on file.

4. The reason(s) for the modification is/are:

See above.

5. Select A or B:

A.   x   The confirmed Chapter 13 Plan is modified as follows:

Allowed general unsecured claims shall receive a pro rata share of not less than \$14,499.

B.        The unconfirmed Chapter 13 Plan is modified as follows:

All remaining terms and provisions of the Plan are unaffected unless specifically addressed herein. In the even of a conflict between the original Plan and the modification set forth above, the latter shall supersede and control.

6. **BY SIGNING BELOW THE PROPONENT OF THE MODIFICATION CERTIFIES THAT, AFTER REVIEW OF THE MODIFICATION AND**

**ALL OTHER TERMS AND PROVISIONS OF THE PLAN, THOSE  
REMAINING TERMS AND PROVISIONS OF THE PLAN ARE  
CONSISTENT WITH THE PROPOSED MODIFICATIONS.**

**CERTIFICATION**

Complete one of the certifications below:

1. I/We, \_\_\_\_\_, the debtor(s) in this case, certify that I/we have reviewed the modification to the Chapter 13 plan proposed in this motion, and I/we authorize my/our attorney to file it with the court.

\_\_\_\_\_  
Debtor

\_\_\_\_\_  
Date

\_\_\_\_\_  
Debtor

\_\_\_\_\_  
Date

OR

2. I, Alexander E. George, attorney for the debtor(s), certify that I have reviewed the modification proposed above with the debtor(s), and that the debtor(s) has/have authorized me to file it with the court.

WHEREFORE, the Proponent requests that the court approve the modification to the Chapter 13 Plan as stated herein.

Respectfully submitted and dated this Tuesday, May 23, 2017.

By: /s/ Alexander E. George  
Alexander E. George  
Attorney for Debtor  
Bar #: 1091339

Alexander E. George  
Geraci Law, LLC  
2505 N. Mayfair Road, Suite 101  
Wauwatosa, WI 53226  
Phone: (312) 809-2983  
Fax: (877) 247-1960  
Email: [wal@geracilaw.com](mailto:wal@geracilaw.com)

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN**

---

**Case No.: 15-27622**  
**Judge: Beth E. Hanan**  
**Chapter: Chapter 13**

**In Re: Adrian Buckley, Sr.**  
**Nicole Buckley**

---

**CERTIFICATE OF SERVICE**

---

The undersigned, an Attorney, does hereby certify that a copy of this Certificate of Service and a copy of the attached Notice and Request to Modify Chapter 13 Plan were mailed First Class to the persons mentioned below, at their respective addresses, postage prepaid, by U.S. Mail in Milwaukee, WI on Tuesday, May 23, 2017:

Adrian Buckley, Sr.  
Nicole Buckley  
4836 N. 66<sup>th</sup> St.  
Milwaukee, WI 53218

**SEE ATTACHED LIST**

Additionally, the documents referenced above were also served via electronic means on the following individuals on Tuesday, May 23, 2017:

United States Trustee  
Eastern District of Wisconsin  
517 E. Wisconsin Ave.  
Milwaukee, WI 53202

Scott Lieske  
Chapter 13 Trustee  
P.O. Box 510920  
Milwaukee, WI 53203

Dated this Tuesday, May 23, 2017.

By: /s/ Alexander E. George  
Alexander E. George  
Attorney of the Debtor  
Bar #: 1091339

Alexander E. George  
Geraci Law, LLC  
2505 N. Mayfair Road, Suite 101  
Wauwatosa, WI 53226  
Phone: (312) 809-2983  
Fax: (877) 247-1960  
Email: [wal@geracilaw.com](mailto:wal@geracilaw.com)

Label Matrix for local noticing  
0757-2  
Case 15-27622-beh  
Eastern District of Wisconsin  
Milwaukee  
Tue May 23 17:23:46 CDT 2017

Alliance Collection AG  
Attn: Bankruptcy Dept.  
3916 S Business Park Ave  
Marshfield,WI 54449-9029

Anytime Fitness  
Bankruptcy Notice  
6900 W Brown Deer Rd  
Brown Deer,WI 53223-2106

Brandon S. Lefkowitz  
24100 Southfield Road  
Suite 203  
Southfield, MI 48075  
Southfield, MI 48075-2851

Convergent HC Recoveri  
Attn: Bankruptcy Dept.  
121 Ne Jefferson St Ste  
Peoria,IL 61602-1256

Experian  
Attn: Bankruptcy Dept.  
PO Box 2002  
Allen,TX 75013-2002

IRS Priority Debt  
Bankruptcy Dept.  
PO Box 7346  
Philadelphia,PA 19101-7346

Milwaukee Water Works  
Billing Dept.  
841 N. Broadway  
Milwaukee,WI 53202-3677

Short Term Financial LLC  
Attn: Bankruptcy Dept.  
880 Lee St Suite 302  
Des Plaines,IL 60016-6487

State Collection Servi  
Attn: Bankruptcy Dept.  
2509 S Stoughton Rd  
Madison,WI 53716-3314

The Bank of New York Mellon Trust Company, N  
Gray & Associates, LLP  
16345 W. Glendale Drive  
New Berlin, WI 53151-2841

AmeriCash Loans of Wisconsin, L.L.C.  
P.O. Box 184  
Des Plaines, IL 60016-0003

Arthur Heitzer  
Notice  
633 W. Wisconsin Ave. Suite  
Milwaukee,WI 53203-1918

(p)CAPITAL ONE  
PO BOX 30285  
SALT LAKE CITY UT 84130-0285

Credit Acceptance  
Bankruptcy Dept.  
4590 East Broad Street  
Columbus,OH 43213-1301

Froedtert Hospital  
Bankruptcy Dept.  
PO Box 9030  
Menomonee Falls,WI 53052-9030

Law Office of Arthur Heitzer  
Attn: Bankruptcy Dept.  
633 W Wisconsin Ave # 1410  
Milwaukee,WI 53203-1920

Ocwen Loan Servicing  
Attn: Bankruptcy Dept.  
12650 Ingenuity Dr  
Orlando,FL 32826-2703

Short Term Financial, LLC  
P.O. Box 184  
Des Plaines, IL 60016-0003

The Bank of New York Mellon Trust Co.,NA  
c/o Ocwen Loan Servicing, LLC  
Attn: Bankruptcy Dept  
PO Box 24605  
West Palm Beach, FL 33416-4605

Wisconsin Department Of Revenue  
P.O. Box 8901  
Madison, WI 53708-8901

(p)AMERICOLLECT INC  
PO BOX 2080  
MANITOWOC WI 54221-2080

Aurora Advanced Healthcare  
Bankruptcy Dept  
PO Box 091700  
Milwaukee,WI 53209-8700

Children's Hospital of Wisconsin  
Bankruptcy Dept.  
9000 W. Wisconsin Ave.  
Milwaukee,WI 53226-4874

Equifax  
Attn: Bankruptcy Dept.  
PO Box 740241  
Atlanta,GA 30374-0241

(p)GUARDIAN CREDIT UNION  
11220 W OKLAHOMA AVE  
WEST ALLIS WI 53227-3937

MILWAUKEE WATER WORKS  
200 E WELLS ST  
RM 800  
MILWAUKEE WI 53202-3515

Office of the U. S. Trustee  
517 East Wisconsin Ave.  
Room 430  
Milwaukee, WI 53202-4510

(p)SPEEDY LOAN CORP  
115 N 4TH ST  
WATERTOWN WI 53094-3860

Tmobile  
C/O Enhanced Recovery CO L  
8014 Bayberry Rd  
Jacksonville,FL 32256-7412

Transunion  
Attn: Bankruptcy Dept.  
PO Box 1000  
Chester,PA 19022-1023

U S DEPT OF ED/GSL/ATL  
Attn: Bankruptcy Dept.  
Po Box 4222  
Iowa City,IA 52244

US Department of Education  
P.O. Box 16448  
St. Paul, MN 55116-0448

We Energies  
Attn Bankruptcy Dept. RM A130  
333 W Everett St  
Milwaukee WI 53203-2803

Wheaton Franciscan Healthcare  
801 South 60th Street, Suite 150  
West Allis, WI 53214-3365

Wheaton Franciscan Med. Group  
Bankruptcy Department  
PO Box 68-9711  
Milwaukee,WI 53268

Wisconsin Acceptance  
Bankruptcy Dept.  
7676 N 76th St.  
Milwaukee,WI 53223-4018

Wisconsin Department of Revenue  
Attn: Special Procedures, MS 4-SPU  
PO BOX 8901  
Madison WI 53708-8901

Wisconsin Electric POW  
Attn: Bankruptcy Dept.  
231 W Michigan St # A130  
Milwaukee,WI 53203-2918

Adrian Buckley Sr.  
4836 N. 66th St.  
Milwaukee, WI 53218-4032

Andrew M. Golanowski  
Geraci Law, L.L.C.  
55 E. Monroe St. Suite #3400  
Chicago, IL 60603-5920

Christopher M. Holoyda  
Geraci Law Office, LLC  
55 E. Monroe #3400  
Chicago, IL 60603-5920

Felicia Petroff  
Geraci Law L.L.C.  
55 E. Monroe #3400  
Chicago, IL 60603-5920

Joseph J. Blaha  
Geraci Law L.L.C.  
55 E. Monroe St. Suite #3400  
Chicago, IL 60603-5920

Kathryn Kay MacKenzie  
Geraci Law L.L.C.  
55 E. Monroe St. Suite #3400  
Chicago, IL 60603-5920

Nicole Buckley  
4836 N. 66th St.  
Milwaukee, WI 53218-4032

Scott Lieske  
Chapter 13 Trustee  
P.O. Box 510920  
Milwaukee, WI 53203-0161

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified  
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Americollect INC  
Attn: Bankruptcy Dept.  
1851 S Alverno Rd  
Manitowoc,WI 54220

Capital ONE BANK USA N  
Attn: Bankruptcy Dept.  
15000 Capital One Dr  
Richmond,VA 23238

Guardian Credit Union  
11220 W Oklahoma Ave  
West Allis, WI 53227

(d)Guardian Credit Union  
Attn: Bankruptcy Dept.  
4219 W National Ave  
Milwaukee,WI 53215

Speedy Loan  
Atten: Bankruptcy  
PO Box 26275  
Wauwatosa,WI 53226

|                     |    |
|---------------------|----|
| End of Label Matrix |    |
| Mailable recipients | 46 |
| Bypassed recipients | 0  |
| Total               | 46 |